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Attorneys for Treasurer of Jefferson County, Montana

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

IN RE

MONTANA TUNNELS MINING, INC.,

Debtor.

Case No. 2:22-BK-20132-BPH

**HEARING DATE**

**Date: December 11, 2024**

**Time: 9:00 a.m.**

**Location: 2nd Floor Courtroom**

**Mike Mansfield Federal Courthouse  
400 N. Main Butte, Montana**

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**TREASURER OF JEFFERSON COUNTY, MONTANA'S  
LIST OF WITNESSES AND EXHIBITS**

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COMES NOW, The Treasurer of Jefferson County, Montana ("County"), a creditor in this Chapter 11 case, and hereby notifies the Court and counsel of the witnesses that it may call, and exhibits it may introduce, at the hearing scheduled for December 11, 2024 on the County's Motion for Relief from the Court's Orders entered at 163 and 164, filed at ECF 167 ("Motion").

## **WITNESSES**

The County intends to call some or all of the following witnesses:

1. Patrick Imeson
2. Joseph Houston
3. James Mooney
4. Terri Kunz
5. Any witness listed by other parties.
6. Witnesses necessary for rebuttal.
7. Witnesses necessary for impeachment.
8. Witnesses necessary for foundation.

## **EXHIBITS**

The County intends to introduce some or all of the following exhibits:

- | <u>Ex. No.</u> | <u>Description</u>  |
|----------------|---|
| 1.             | Colorado Secretary of State Organizational Record Confirmation (Doc. 180-1)   |
| 2.             | Certificate of Assignment of County's Interest in Property Lien dated December 21, 2021 (Doc. 180-2)  |
| 3.             | Unpaid Metal Mine Extraction Taxes (Doc. 180-3)   |
| 4.             | Notice that a Tax Deed may be Issued dated May 9, 2024 (Doc. 146-1)   |
| 5.             | Letter from Joseph Houston, counsel for Goldfields Funding Partners, LLC, to Montana Department of Environmental Quality dated July 26, 2024.                         |
| 6.             | Letter from James Mooney to Martin S. King dated December 6, 2024.  |
| 7.             | All schedules, pleadings, plans, orders, transcripts, testimony, operating reports, and all other documents, reports and records of whatever type filed in this case. |

8. All schedules, pleadings, orders, transcripts, testimony, operating reports, and all other documents, reports and records of whatever type filed in *LD Construction, Inc.*, United States Bankruptcy Court, District of Montana case number 4:23-bk-40063-BPH
9. All exhibits listed by other parties.
10. Documents and evidence necessary for impeachment.
11. Documents and evidence necessary for rebuttal.

Respectfully submitted this 6<sup>th</sup> day of December, 2024.

By: /s/ Martin S. King  
Martin S. King, Attorney for  
Treasurer of Jefferson County, Montana

#### CERTIFICATE OF MAILING

I, the undersigned, do hereby certify under penalty of perjury, that on December 6, 2024, a copy of the foregoing document was served by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and by first class mail as follows:

Montana Tunnels Mining, Inc.  
P.O. Box 176  
Jefferson City, MT 59638-0176

/s/ Christina DiMuro  
Christina DiMuro